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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SCOTT FREEMAN, M.D., as trustee for the  
SCOTT MITCHELL FREEMAN  
REVOCABLE LIVING TRUST, dated March  
10, 2012, for itself and as assignee of  
FERDINAND BELGA,

Plaintiff,

v.

STEPHEN HURST; SUNRAY ASSET  
MANAGEMENT, INC., NICO FORTE,  
CERUVIA LIFESCIENCES f/k/a CH-TAC;  
CAREY TURNBULL; RUSSELL BURBANK,  
as liquidating trustee for nominal defendants  
SAVANT ADDICTION MEDICINE, LLC and  
SAVANT HWP HOLDINGS, LLC; DOE  
INDIVIDUALS 1 through 20; and ROSE

Case No. 2:22-cv-01433-RFB-VCF  
(Consolidated with 2:22-cv-01903-JCM-BNW)

**STIPULATED MOTION AND ORDER  
TO:**

**(1) EXTEND DEADLINE FOR  
CERUVIA LIFESCIENCES AND  
CAREY TURNBULL TO FILE REPLY  
IN SUPPORT OF MOTION TO  
DISMISS (ECF NO. 62) AND IN  
RESPONSE TO PLAINTIFF'S  
OPPOSITION (ECF NO. 85)  
(SECOND REQUEST)**

**AND**

HOLLEY DRIGGS

CORPORATIONS 1 through 20,

Defendants,

AND

SAVANT ADDICTION MEDICINE, LLC;  
SAVANT HWP HOLDINGS, LLC; and  
SAVANT HWP HOLDINGS, LLC,

Nominal Defendants.

**(2) TO EXCEED PAGE LIMIT ON  
REPLY IN SUPPORT OF MOTION TO  
DISMISS (ECF NO. 62) AND IN  
RESPONSE TO PLAINTIFF’S  
OPPOSITION (ECF NO. 85)**

(FIRST REQUEST)

Defendants CAREY TURNBULL and CERUVIA LIFESCIENCES LLC (“*Ceruvia Defendants*”) and Plaintiff SCOTT FREEMAN, M.D., AS TRUSTEE FOR THE SCOTT MITCHELL FREEMAN REVOCABLE LIVING TRUST, DATED MARCH 10, 2012, FOR ITSELF AND AS ASSIGNEE OF FERDINAND BELGA (“*Plaintiff*”) hereby stipulate to an extension of time for the Ceruvia Defendants to file their reply brief in support of their Motion to Dismiss (ECF No. 62) and in response to Plaintiff’s opposition brief (ECF No. 85) from May 15, 2023 to July 15, 2023.

Good cause exists for this extension as the Ceruvia Defendants and Plaintiff are involved in substantive settlement discussions and have reached an agreement in principle to settle the claims between them. To permit time for the parties to finalize such settlement documents, to avoid further incurrence of attorneys’ fees and costs, and any further use of judicial resources related to disposition of the Ceruvia Defendants’ motion, the parties request this extension to permit an opportunity to reach resolution of their dispute. This is the parties’ second request to extend the Ceruvia Defendants’ reply brief deadline.

Only in the event the aforementioned settlement does not finalize, the parties also hereby stipulate for the Ceruvia Defendants to have permission to file a reply brief with a limit of up to 20 pages. More specifically, on December 22, 2022, the Ceruvia Defendants filed a Motion to Dismiss the Amended Complaint (“*Motion*”) (ECF No. 62). On February 15, 2023, Plaintiff filed a 55-page Opposition to Motion to Dismiss (“*Opposition*”) (ECF No. 85), as well as a Motion for

Leave to Exceed to Page Limit (ECF No. 96). In order for the Ceruvia Defendants to accurately and completely respond to Plaintiff's lengthy Opposition, the Ceruvia Defendants request to exceed the 12-page limit set by Local Rule 7-3 and to increase the limit for their Reply to 20 pages.

This is the parties' first request related to any increase of the page limit permitted for the Ceruvia Defendants' reply brief.

IT IS SO STIPULATED.

Dated this 8th day of May 2023.

/s/ Abraham G. Smith  
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IT IS ORDERED.

  
 RICHARD F. BOULWARE, II  
 UNITED STATES DISTRICT JUDGE

DATED this 10th day of May, 2023.

HOLLEY DRIGGS